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**FILED**

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
DEL RIO DIVISION

2013 NO 20 AM 11:14

WESTERN DISTRICT OF TEXAS  
U.S. CLERK'S OFFICE

UNITED STATES OF AMERICA

§ **INDICTMENT**

BY: \_\_\_\_\_ DEPUTY

v.

§ **COUNT ONE:** 18 U.S.C. § 666(a)(2), Paying  
§ a Bribe to an Agent of an Organization  
§ Receiving Federal Funds;  
§  
§  
§

SAUL LOMBRANA

**DR 13 CR 1489 AM**

THE GRAND JURY CHARGES:

At All Times Material To This Indictment:

1. SAUL LOMBRANA was the owner and operator of Fiesta Contractors, a construction company based in Eagle Pass, Texas.
2. Maverick County, Texas utilized private contractors to perform county construction projects. Contractors would submit bids for specific jobs. When a contractor was selected, he or she would receive 50% of the total project payment to commence work and the remaining 50% upon completion.
3. Maverick County accepted bids to construct 155 linear feet of concrete drain swell on Rafael St. in Precinct 1 in March 2011. SAUL LOMBRANA submitted paperwork requesting a total of \$14,500 to complete the project--\$7,250 to commence work and the remaining \$7,250 upon completion. On March 21, 2011 SAUL LOMBRANA was selected by Maverick County to complete that project for that amount.
4. Maverick County check number 868 was issued on March 22, 2011 to "Fiesta Contr. Saul

Lombrana” for \$7,250. That check was redeemed by SAUL LOMBRANA.

5. SAUL LOMBRANA submitted an invoice to Maverick County requesting full payment for the project (the remaining \$7,250) on March 24, 2011.

6. Maverick County check number 883 was issued on April 6, 2011 to “Fiesta Contr. Saul Lombrana” for \$7,250. That check was redeemed by SAUL LOMBRANA.

7. SAUL LOMBRANA never constructed 155 linear feet of concrete drain swell on Rafael St. in Precinct 1.

8. SAUL LOMBRANA in fact paid money to MAVERICK COUNTY EMPLOYEE 1 in return for being awarded the contract.

COUNT ONE  
[18 U.S.C. § 666(a)(2)]

9. Paragraphs One through Eight above are realleged and incorporated by reference as if fully set forth herein.

10. At all times material to this indictment Maverick County, Texas was a local government that received in the one year period beginning on January 1, 2011 benefits in excess of \$10,000 under Department of Homeland Security Grant Program Operation Stonegarden.

11. From on or about March 1, 2011 to on or about April 30, 2011 in the Western District of Texas, the Defendant,

SAUL LOMBRANA

did corruptly give, offer, and agree to give a thing of value to MAVERICK COUNTY EMPLOYEE 1, who was an agent or employee of Maverick County, intending to influence and reward MAVERICK COUNTY EMPLOYEE 1 in connection with a transaction and series of transactions of Maverick County involving \$5,000 or more, in violation of 18 U.S.C. § 666(a)(2).

A TRUE BILL.

ROBERT PITMAN  
United States Attorney

By: 

MICHAEL C. GALDO

BRYAN N. REEVES

Assistant United States Attorneys

**DR 13CR1489**

SEALED:  
UNSEALED: XX

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
DEL RIO DIVISION

COUNTY: Maverick USAO #: 2013R23287  
DATE: November 20, 2013 MAG. CT. #: MATTER  
AUSA: MICHAEL C. GALDO  
DEFENDANT: SAUL LOMBRANA  
CITIZENSHIP: U.S.  
INTERPRETER NEEDED: No Language: English  
DEFENSE ATTORNEY:  
ADDRESS OF ATTORNEY:  
DEFENDANT IS: At Large DATE OF ARREST: N/A  
BENCH WARRANT NEEDED: YES  
PROBATION OFFICER: N/A  
NAME AND ADDRESS OF SURETY: N/A  
YOUTH CORRECTIONS ACT APPLICABLE: NO  
PROSECUTION BY: INDICTMENT  
OFFENSE: (Code & Description): Count 1: 18 U.S.C. § 666 – Paying Bribe To An Agent of  
Organization Receiving Federal Funds.  
OFFENSE IS A: FELONY  
MAXIMUM SENTENCE: Counts 1: up to 10 years imprisonment; a \$250,000 fine; 3 years of  
supervised release; and a \$100 special assessment on all counts.  
PENALTY IS MANDATORY: YES & NO  
REMARKS: See above W/DT-CR-3